

1 **KIMBERLY MAXSON-RUSHTON, ESQ.**  
Nevada Bar No. 5065  
2 **GREGORY A. KRAEMER, ESQ.**  
Nevada Bar No. 10911  
3 **COOPER LEVENSON, P.A.**  
1835 Village Center Circle  
4 Las Vegas, Nevada 89134  
T: (702) 366-1125  
5 F: (702) 366-1857  
krushton@cooperlevenson.com  
6 gkraemer@cooperlevenson.com  
*Attorneys for Plaintiffs*

7 and

8 **ALFRED J. BENNINGTON, JR., ESQ.**  
Florida Bar No. 404985  
(*Pro hac vice* to be filed)  
9 **GLENNYS ORTEGA RUBIN, ESQ.**  
Florida Bar No. 556361  
(*Pro hac vice* to be filed)  
10 **SHUTTS & BOWEN LLP**  
300 South Orange Avenue, Suite 1000  
12 Orlando, Florida 32801  
T: (407) 835-6755  
13 F: (407) 849-7255  
bbennington@shutts.com  
14 grubin@shutts.com  
15 *Attorneys for Plaintiffs*

16 and

17 **DANIEL J. BARSKY, ESQ.**  
Florida Bar No. 25713  
(*Pro hac vice* to be filed)  
18 **SHUTTS & BOWEN LLP**  
200 South Biscayne Boulevard, Suite 4100  
19 Miami, Florida 33131  
T: (561) 650-8518  
20 F: (561) 822-5527  
dbarsky@shutts.com  
21 *Attorneys for Plaintiffs*

22  
23 **IN THE UNITED STATES DISTRICT COURT**

24 **FOR THE DISTRICT OF NEVADA**

25 **DIAMOND RESORTS INTERNATIONAL,**  
INC., a Delaware corporation; **DIAMOND**  
26 **RESORTS CORPORATION,** a Maryland  
corporation, **DIAMOND RESORTS U.S.**  
27 **COLLECTION DEVELOPMENT, LLC,** a  
Delaware limited liability company, and  
28 **DIAMOND RESORTS MANAGEMENT,**

**CASE NO. 2:17-cv-03007-RFB-VCF**

**MOTION ENLARGEMENT OF TIME**

1 INC., an Arizona corporation,

2 Plaintiffs,

3 vs.

4 REED HEIN & ASSOCIATES, LLC, a  
5 Washington limited liability company, d/b/a  
6 TIMESHARE EXIT TEAM; BRANDON  
7 REED, an individual and citizen of the state of  
8 Washington; TREVOR HEIN, an individual and  
9 citizen of Canada; and SCOTT LOUGHRAM,  
an individual and citizen of the state of  
Washington,

10 Defendants.

**MOTION ENLARGEMENT OF TIME**

11 Plaintiffs Diamond Resorts International, Inc., Diamond Resorts Corporation, Diamond  
12 Resorts U.S. Collection Development, LLC, and Diamond Resorts Management, Inc. (collectively,  
13 "Diamond"), request that the Court enlarge the deadline for the parties to file their proposed  
14 confidentiality order. Defense counsel has informed counsel for Plaintiffs that defense counsel is  
15 presently in trial and cannot review the proposed confidentiality order. Plaintiffs therefore request an  
16 additional 10 days to file the proposed confidentiality order with the Court. As no discovery  
17 responses are yet due this request does not prejudice any party to this action.

18 DATED this 25th day of May, 2018.

19 COOPER LEVENSON, P.A.  
20 SHUTTS & BOWEN LLP

21 /s/ Gregory A. Kraemer  
22 KIMBERLY MAXON-RUSHTON  
23 Nevada Bar No. 5065  
GREGORY A. KRAEMER, ESQ.  
Nevada Bar No. 10911  
1835 Village Center Circle  
Las Vegas, Nevada 89134

IT IS SO ORDERED.

  
UNITED STATES MAGISTRATE JUDGE  
DATED: 5-29-2018

and

ALFRED J. BENNINGTON, JR., ESQ.  
Florida Bar No. 404985  
(Admitted Pro Hac Vice)  
GLENNYS ORTEGA RUBIN, ESQ.  
Florida Bar No. 556361  
(Admitted Pro Hac Vice)

1 **SHUTTS & BOWEN LLP**  
2 **300 South Orange Avenue, Suite 1600**  
3 **Orlando, Florida 32801**

4 **and**

5 **DANIEL J. BARSKY, ESQ.**  
6 **Florida Bar No. 25713**  
7 **(Pro Hac Vice Filed)**  
8 **SHUTTS & BOWEN LLP**  
9 **200 South Biscayne Boulevard, Suite 4100**  
10 **Miami, Florida 33131**

11 *Attorneys for Plaintiffs*  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that on the 25th day of May, 2018, the foregoing was filed with the Clerk  
3 of the Court using the CM/ECF System, which will serve a Notice of Electronic Filing upon the  
4 following CM/ECF Participants, and on the above date I served a true and correct copy of the foregoing  
**MOTION ENLARGEMENT OF TIME** via U.S. Mail, postage prepaid, upon the following non-  
CM/ECF Participants:

5  
6 **CM/ECF PARTICIPANTS**

7 Bruce Alan Finck, Esq.  
8 Email: bfinck@bentonorr.com  
9 Kevin M. McCormick, Esq.  
10 kmccormick@bentonorr.com  
11 Panda Kroll, Esq.  
12 Email: pkroll@bentonorr.com  
Benton, Orr, Duval & Buckingham  
39 North California Street  
Ventura, California 93001  
Telephone: 805-648-5111

13 And

14 Robert S. Larsen, Esq.  
15 Email: rlarsen@grsm.com  
16 David T. Gluth, II, Esq.  
17 Email: dgluth@grsm.com  
Gordon Rees, Scully Mansukhani, LLP  
300 South 4<sup>th</sup> Street, Suite 1550  
Las Vegas, Nevada 89101  
Telephone: 702-577-9301

19 *Attorneys for Defendants, Reed Hein &*  
20 *Associates, LLC d/b/a Timeshare Exit Team,*  
21 *Brandon Reed, Trevor Hein, and Scott*  
*Loughram*

22  
23 CLAC 4501785.1  
24  
25  
26  
27  
28